

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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November 23, 2021

BY ECF

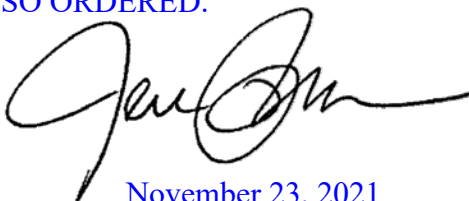
The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

RE: United States v. Alhassan et al.
21 Cr. 523 (JMF)

Dear Judge Furman:

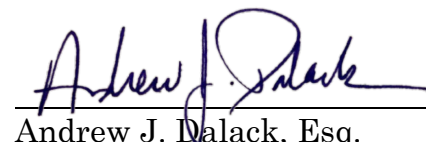
I represent Abdul Mumuni and write on behalf of the parties regarding the Court's Order dated November 22, 2021 in the above-captioned case. Dkt. No. 45. Without objection from the Government, counsel for the defendants respectfully request a 30-day extension of the December 1, 2021 deadline to file Rule 12 motions and a 30-day adjournment of the status conference, currently scheduled for December 7, 2021 at 10:00 a.m. We require this extension to continue reviewing the voluminous discovery produced to date and to advance discussions concerning a potential pre-trial resolution. The parties further submit that excluding the period of delay from December 7, 2021 to the date of the next status conference is justified because the time is necessary to review discovery and facilitate productive plea negotiations. 18 U.S.C. § 3161(h)(7)(A).

Application GRANTED. Any pre-trial motions from the defendants are due by January 7, 2022, any response from the Government is due by January 21, 2022, and any reply from the defendant is due by January 28, 2022. The pretrial conference is adjourned to January 13, 2022, at 10:00 a.m. Time is excluded in the interests of justice from today, until January 13, 2022, for the reasons set forth in defense counsel's letter. The Clerk of Court is directed to terminate Doc. #46. SO ORDERED.



November 23, 2021

Respectfully Submitted,



Andrew J. Dalack, Esq.
Assistant Federal Defender

Counsel for Abdul Mumuni